

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

Case No. 24-11550

CITY OF MIAMI,
Defendant/Appellant,

v.

GRACE, INC.; ENGAGE MIAMI, INC.;
SOUTH DADE BRANCH OF THE NAACP;
MIAMI-DADE BRANCH OF THE NAACP;
CLARICE COOPER; YANELIS VALDES;
JARED JOHNSON; and ALEXANDRA
CONTRERAS,

Plaintiffs/Appellees.

APPEAL FROM THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 1:22-cv-24066-KMM

MOTION FOR DISMISSAL

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT**

The parties furnish this certificate of interested persons and corporate disclosure statement.

1. Abbott, Carolyn, Plaintiff/Appellee's expert
2. ACLU Foundation of Florida, Inc., Counsel for Plaintiffs/Appellees
3. Alford, John, Defendant/Appellant's expert
4. Bardos, Andy, Counsel for Defendant/Appellant
5. Carollo, Joe, Defendant/Appellant
6. City of Miami, Defendant/Appellant
7. Cody, Steven, Defendant/Appellant's expert
8. Contreras, Alexandra, Plaintiff/Appellee
9. Cooper, Clarice, Plaintiff/Appellee
10. Covo, Sabina, Defendant/Appellant
11. De Grandy, Miguel, Defendant/Appellant's expert
12. Dechert LLP, Counsel for Plaintiffs/Appellees
13. Diaz de la Portilla, Alex, Defendant/Appellant
14. Engage Miami, Inc., Plaintiff/Appellee
15. Gabela, Miguel, Defendant/Appellant
16. GRACE, Inc., Plaintiff/Appellee

17. GrayRobinson, P.A., Counsel for Defendant/Appellant
18. Greco, John A, Counsel for Defendant/Appellant
19. Johnson, Christopher N., Counsel for Defendant/Appellant
20. Johnson, Jared, Plaintiff/Appellee
21. Jones, Kevin R., Counsel for Defendant/Appellant
22. King, Christine, Defendant/Appellant
23. Kirsch, Jocelyn Kirsch, Counsel for Plaintiff/Appellee
24. Levesque, George T., Counsel for Defendant/Appellant
25. Louis, Lauren F., United States Magistrate Judge, Southern District of Florida
26. McCartan, Cory, Plaintiff/Appellee's expert
27. McNamara, Caroline A., Counsel for Plaintiff/Appellee
28. McNulty, Kerri L., Counsel for Defendant/Appellant
29. Méndez, Victoria, Counsel for Defendant/Appellant
30. Merken, Christopher J., Counsel for Plaintiff/Appellee
31. Miami-Dade Branch of the NAACP, Plaintiff/Appellee
32. Moore, K. Michael, United States District Judge, Southern District of Florida
33. Moy, Bryant J., Plaintiff/Appellee's expert

34. NAACP Florida State Conference, State Affiliate of Plaintiffs/Appellees
35. National Association for the Advancement of Colored People (NAACP)
36. Pardo, Damian, Defendant/Appellant
37. Quintana, Marlene, Counsel for Defendant/Appellant
38. Reyes, Manolo, Defendant/Appellant
39. South Dade Branch of the NAACP, Plaintiff/Appellee
40. Steiner, Neil A., Counsel for Plaintiff/Appellee
41. Suarez, Francis, Defendant/Appellant
42. Tilley, Daniel T., Counsel for Plaintiff/Appellee
43. Unger, Jason L., Counsel for Defendant/Appellant
44. Valdes, Yanelis, Plaintiff/Appellee
45. Warren, Nicholas L.V., Counsel for Plaintiff/Appellee
46. Wysong, George, Counsel for Defendant/Appellant

CORPORATE DISCLOSURE STATEMENT

I hereby certify pursuant to 11th Circuit Rule 26.1-3(b) that no publicly traded company or corporation has an interest in the outcome of the case or appeal.

No other trial judge, attorney, person, association of persons, firm, partnership, or corporation known to the Appellant, City of Miami, or its counsel, has any current interest in the outcome of this matter.

MOTION FOR DISMISSAL

Pursuant to Federal Rule of Appellate Procedure 42(b)(1), Appellant, the City of Miami, respectfully moves to dismiss this appeal. Appellees, GRACE, Inc.; Engage Miami, Inc.; South Dade Branch of the NAACP; Miami-Dade Brach of the NAACP; Clarice Cooper; Yanelis Valdes; Jared Johnson; Alexandra Contreras; and Steven Miro, do not oppose and stipulate to the dismissal of this appeal.

Each party will bear its own costs associated with this appeal.

WHEREFORE, Appellant, the City of Miami, respectfully moves to dismiss this appeal.

Respectfully submitted on this 5th day of July, 2024,

/s/ Nicholas L.V. Wareren
Nicholas L.V. Warren
(FBN 1019018)
ACLU FOUNDATION OF FLORIDA
1809 Art Museum Dr., Suite 203
Jacksonville, Florida 32205
Telephone: 786-363-1769
nwarren@aclufl.org

/s/ Christopher N. Johnson
Christopher N. Johnson
(FBN 69329)
GRAYROBINSON, P.A.
333 S.E. 2nd Avenue
Suite 3200
Miami, Florida 33131
Telephone: 305-416-6880

Daniel B. Tilley (FBN 102882)
Caroline A. McNamara
(FBN 1038132)
ACLU FOUNDATION OF FLORIDA
4343 West Flagler Street,
Suite 400
Miami, Florida 33134
Telephone: 786-363-2714
dtalley@aclufl.org
cmcnamara@aclufl.org

George T. Levesque
(FBN 55555)
GRAYROBINSON, P.A.
301 South Bronough Street,
Suite 600
Tallahassee, Florida 32301
Telephone: 850-577-9090
george.levesque@gray-robinson.com

Attorneys for Defendant-Appellant

Christopher J. Merken
Pennsylvania Bar No. 329814
DECHERT, LLP
2929 Arch Street
Philadelphia, Pennsylvania 19104
Telephone: 215-994-4000
christopher.merken@dechert.com

Attorneys for Plaintiffs-Appellees

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), undersigned counsel certifies, in reliance on the word count of the word-processing system used to prepare this document, that this document contains 775 words and therefore complies with the type-volume limitation set forth in Federal Rule of Appellate Rule 27(d)(2).

Undersigned counsel further certifies that this document was prepared in a proportionally spaced typeface using Bookman Old Style in 14-point font and therefore complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-style requirements of Federal Rule of Appellate Procedure 32(a)(6).

/s/ Christopher N. Johnson
Christopher N. Johnson

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 5, 2024, the foregoing was filed with the Court's CM/ECF system generating service upon all counsel of record.

/s/ Christopher N. Johnson
Christopher N. Johnson